ATTACHMENT I

ATTACHMENT I

PERSONNEL TRAINING PLAN

PERSONNEL TRAINING PLAN

The information contained in this section outlines the personnel training plan for the Colfax Creosoting Company in accordance with the requirements of LAC 33:V.1515.

All employees in the treating area, laboratory, and those having responsibilities with the corrective action activities shall receive hazardous waste training within six months from the date at which they are hired, assigned to the facility, or assigned to a new position at the facility. A copy of the training records and personnel records shall be kept on file at the treating plant. The training program and training records shall be updated yearly.

The training program shall include the following:

1. The hazardous nature of chemicals and chemical wastes in general.

2. The purpose of RCRA and importance of compliance with RCRA regulations.

3. The hazardous nature of the wastes and chemicals being generated and stored at the facility.

4. Proper handling and storage procedures for wastes.

5. Emergency procedures and contingency plan.

6. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment.

7. Means for immediate feed cut-off systems.

8. Communication and alarm systems.

9. Response to fire or explosions.

10. Response to ground water contamination.

11. Shutdown operations.

A copy of the personnel training program shall be on file at the plant. In addition, the following records shall also be on file at the plant:

1. A job description of each position.

2. Description of training needed for each position.

3. Records documenting employee training. (Shall be kept until closure for current employees, and for three years after an employee last works at the facility.)

TRAINING PROGRAM

1. Emergency and monitoring equipment. All treaters shall be able to perform the following procedures:

   (a) Inspect all valves, pumps and pipes used in the training process;

   (b) Know the location and determine the charge of all fire extinguishers in the treating area;

   (c) Know the use of and be able to inspect all gauges and indicators.

2. Means for immediate feed cut-off systems.

   (a) Know the current and maximum level to fill each tank; and

   (b) Know the current and maximum level before any waste water or hazardous wastes are pumped to ponds.

3. Communication and alarm systems.

   All employees in the treating area and laboratory shall know the location of the supervisor's telephone number. If any problem or emergency should arise, the supervisor should be notified immediately. Any alarm systems, immediate loss of pressure and loss of level shall be heeded. The problem causing the condition shall be determined and reported to the supervisor.

4. Response to fire or explosion.

   (a) Creosote and penta fires

   Many fires in creosote and penta plants occur in the door sump and work tank areas.

Step No. 1 Stop all treating operations and close all valves.

Step No. 2 Phone fire department and give a brief description of type and location of fire.

Step No. 3 Contact supervisor(s)

Step No. 4 Attempt to keep fire under control until help arrives. If fire is in door sump area and if no electrical equipment is involved, use fog nozzle. Where electrical equipment is involved, first shut off main disconnect at motor control center, then water may be used to extinguish fire.

A fire in a work tank should be treated the same, with the following exceptions: As much water as possible should be directed to the top and sides of the tank to keep it cool. When the fire department arrives, foam should be used to extinguish the fire.

(b) Electrical fires

In the case of an electrical fire where oil is not present or is present in small amounts, first shut off the main disconnect at the Motor Control Center and use a dry chemical fire extinguisher. If this proves to be unsatisfactory, make sure the current is off and use a water fog.

NOTE: Dry Chemical Fire Extinguishers may be used on small oil fires.

5. Response to ground water contamination.

In the event of detection of groundwater contamination, all hazardous waste activities will be stopped immediately. Employees will be instructed on the shutdown operations of all hazardous waste activities. All hazardous wastes will be contained until the source of contamination is identified.

6. Shutdown operations.

All employees in the treating area and laboratory will be instructed in complete shutdown operations. A detailed list of instructions shall be posted in the treating room.

Step No. 1 Close main valve on steam line.

Step No. 2 Drain gas compressors and vacuum pumps.

Step No. 3 Drain all pumps.

Step No. 4 Make sure water is running through air compressors.

Step No. 5 Make sure any condenser water pumps are running.

Step No. 6 Open any steam by-pass valves.

Step No. 7 Turn power off to any electrical valves and panel boards.

Step No. 8 Drain any heat exchangers

Step No. 9 Drain any sump pumps.

A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position having to do with hazardous waste handling or inspection is as follows:

Introductory:

1. Reading and discussion of the Training Manual before beginning job.

2. Reading and discussion of the SPCC Plan and Contingency Plan before beginning job.

3. A discussion of the proper way to handle the hazardous materials including the use and care of protection equipment before beginning job.

4. The above three items shall consist of a minimum of one (1) hour instruction.

Continuing:

1. A review of items 1, 2, & 3 above.

2. A discussion of special topics involving hazardous waste matters at the facility.

3. A review of the steps to contain a spill at the facility using a "walk around" instruction technique.

4. The above items shall consist of a minimum of one (1) hour instruction each 12 month period.

The following is an organizational chart of Colfax Creosoting Company and a job description for each position. The job description includes the duties and amount of training needed.

EMERGENCY COORDINATOR/TRAINER

Carl Johnson

ENVIRONMENTAL OPERATIONS
SUPERINTENDENT

Carl Johnson

TREATING SUPERVISOR

Jim Brotman

ASSISTANT TREATING
ENGINEER

Joe Brossett
Frankie Hadnot
Ralph Guffey
Nathan Brossett

FIGURE VII-2

ORGANIZATIONAL CHART FOR COLFAX CREOSOTING COMPANY

Position Title: Emergency Coordinator

Position Responsibilities and Duties:

Reports to owner/operator

Emergency coordinator for all hazardous waste activities

Fire brigade chief

Training of plant personnel in the proper handling of raw materials, intermediates, finished products, and waste by-products.

Responsible for all air, water and solid waste control systems on the site.

Verify that all required permits and licenses or modifications have been obtained from local, state, and Federal regulatory bodies.

Resolves problems involving permits and licenses from local, state, and Federal regulatory agencies.

Notifies proper authorities in emergency situations.

Regularly inspects plant grounds and all facilities for status of air, water, and solid/hazardous waste emissions and controls.

Consults with maintenance foreman on questions involving emergency action.

Assists in drafting a submission of required reports to EPA and/or the State.

Experience and Qualifications:

1-3 years experience in industrial or municipal pollution control management.

At least 1 formal hazardous waste session must be completed.

Should regularly attend refresher courses as offered and/or necessary.

Position Title: Environmental Operations Superintendent

Position Responsibilities and Duties:

Overall operation and maintenance of the hazardous waste storage facility.

Maintains facility compliance with RCRA and other permits.

Oversees operators and reviews their performance.

Trains operators to:
- Operate materials handling equipment safely and effectively.
- Handle leaks, spills, and emergency situations.

Maintains operating log, monitoring records, maintenance records, inspection records, personnel training records, and all other required records.

Notifies plant Emergency Coordinator and if so directed, proper authorities in emergency situations.

Schedules all maintenance and repairs to structures and equipment for the hazardous waste management facility.

Oversees mechanic/electrician doing both scheduled and unscheduled maintenance and repair work to be sure he is not releasing hazardous wastes to the environment or contaminating himself.

Inspects tanks, drums and other storage equipment, and any gauges, dials, indicators, and recorders as required for proper operation and structural integrity.

Inspects drum storage area for evidence of leaks and spills and inappropriately placed drums.

Inspects emergency equipment on a regular basis.

Reports to management concerning environmental conditions and problems.

Experience and Qualifications:

2-3 years experience in plant operation.

Hazardous waste management experience helpful but not required.

Must attend training session once per year for a minimum of one (1) hour.

Note: If applicant has no hazardous waste experience, special training in the functions and operation of a hazardous waste storage facility will be required before assuming job responsibilities. This training will be provided by Colfax Creosoting Company.

Position Title: Treating Supervisor

Position Responsibilities:

Reports to environmental operations superintendent.

Operates waste handling equipment.

Reviews all generated wastes and routes wastes to proper storage locations.

Assists in training of new operators to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.

Makes appropriate entries into operating log, monitoring records, inspection records, and maintenance records accordingly, and files or transmits them according to established system.

Notifies supervisors and other plant authorities as necessary in emergency situations.

Takes emergency action on own authority in accordance with established procedures.

Experience and Qualifications:

1 year experience as assistant treating engineer or other position with related activities.

Must attend training session once per year for a minimum of one (1) hour.

Note: Treating supervisor will also be required to be able to maintain and inspect other pollution control equipment on site.

Colfax Creosoting Co.
Training Manual
Aug. 9, 1985

Following is a description of handling creosote, penta and CCA wastes, along with housekeeping procedures, that is presented in the training program.

PROCEDURES TO FOLLOW WHEN USING CREOSOTE, PENTA AND CCA PRESERVATIVES

1. All applicators must wear gloves impervious to the wood treatment solution (e.g. rubber) in all situations where dermal contact with creosote is possible (e.g., handing treated wood and opening cylinder doors).

2. All applicators who open treatment cylinder doors must wear gloves and have a properly maintained half-mask canister or cartridge respirator designed for pesticide use available.

3. Applicators who enter pressure treatment cylinders and other related equipment must wear a neoprene-coated cotton or rubberized overall, jacket, gloves and boots, and a properly maintained half-mask canister or cartridge respirator designed for pesticide use.

   a. All applicators must leave all protective clothing, work shoes or boots, and equipment at the plant at the end of the day. Worn-out protective clothing must be disposed of in accordance with the instructions for pesticide container disposal.

   b. A closed emptying and a closed mixing system must be used for all powder formulations of the inorganic arsenicals.

   c. A closed emptying and a closed mixing system must be used for all prilled (granular) formulations of pentachlorophenol

   d. Eating, drinking, and smoking is prohibited

in the immediate area of significant concentrations of fumes from creosote or pentachlorophenol products.

PERSONNEL TRAINING PROGRAM FOR HAZARDOUS WASTE TREATMENT FACILITIES

Employee Name: _____
Last First Middle

Date First Employed In Position: _____

Date Last Employed In Position: _____

Position: _____

Description of Training	Amount of Training	Date	Directed By

Allied Chemical

CHEMICALS COMPANY

PRODUCT SAFETY DATA SHEET

A. GENERAL INFORMATION

TRADE NAME (COMMON NAME OR SYNONYM)	☒ C.A.S. NO. ☐ ALLIED PRODUCT CODE #
Creosote	61789-28-4

CHEMICAL NAME

2, 3 and 4 ringed polynuclear aromatic hydrocarbons including some substituted compounds

FORMULA	MOLECULAR WEIGHT
Mixture of organic compounds	130-210

COMPANY/PLANT ADDRESS (No., STREET, CITY, STATE AND ZIP CODE)

Chemicals Company
P.O. Box 1053R
Morristown, New Jersey 07960 Attention: Tar Products Department

CONTACT	PHONE NUMBER	ISSUED DATE	REVISED DATE
Manager, Technical & Environmental Services	201-455-5611	August 1980	

B. FIRST AID MEASURES

EMERGENCY PHONE NUMBER: 614-533-1040

INHALATION: Remove to fresh air. If not breathing, give artificial respiration; preferably mouth to mouth. If breathing is difficult, give oxygen. Call a physician.
SKIN CONTACT: Remove with waterless hand cleaners or soap and water. Avoid solvents.
EYE CONTACT: Flush eyes immediately with large amounts of water or mineral oil for at least 15 minutes. Call a physician.
INGESTION: First induce vomiting, then take 2 tablespoons of activated charcoal - USP (drug grade) in water. Get immediate medical assistance.

C. HAZARDS INFORMATION

FIRE AND EXPLOSION

FLASH POINT	AUTO IGNITION TEMPERATURE	FLAMMABLE LIMITS IN AIR (% BY VOL.)
> 70 °C ☐ OPEN CUP ☒ CLOSED CUP	°C	LOWER UPPER

UNUSUAL FIRE AND EXPLOSION HAZARDS

Water/fog can control unconfined fires, but water may cause frothing or eruption in closed tanks. When heated to elevated temperatures, it emits lower molecular weight hydrocarbons.

HEALTH

INHALATION

Overexposure to vapor may result in irritation to respiratory tract. Prolonged exposure in significant excess of permissible air concentrations can result in acute toxic effects, such as respiratory difficulty, convulsions and possible cardiovascular collapse.

INGESTION

Irritation of the gastro intestinal tract followed by nausea and vomiting, abdominal discomfort, rapid pulse, etc. Cardiovascular collapse may occur. Fatal dose is approximately 0.1 g/kg of body weight.

SKIN

Contact with skin can result in irritation which when not washed off or when accentuated by sunlight, can result in minor burns.

EYES

Overexposure to product vapors can result in irritation. Eye contact with product will result in irritation, which in the absence of recommended first aid can result in minor burns to the eyes.

PERMISSIBLE CONCENTRATION: AIR (SEE SECTION J)

OSHA exposure limit - TWA 8 hours is 0.2 mg/m^3 (PPAH)

BIOLOGICAL

UNUSUAL CHRONIC TOXICITY

Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growths and may in some cases, result in skin cancer.

D. PRECAUTIONS/PROCEDURES

VENTILATION

Avoid breathing vapors, ventilate work area, wear respirator, goggles, or face shield.

NORMAL HANDLING

Wear clothing closed at the neck, long sleeves and non-porous type gloves.

STORAGE

Recommended temperature for storage is about 38°C (100°F)

PRECAUTIONARY LABEL ☐ ATTACHED ☒ NOT ATTACHED

SPILL OR LEAK

Avoid breathing vapors and contact with skin and eyes. Avoid sources of ignition (sparks or open flame). Contain the spill or leak with solids, such as sand, earth, etc., dispose of in approved landfill or burn in approved incinerator.

FIRE EXTINGUISHING AGENTS RECOMMENDED

Water/fog, carbon dioxide, foam, dry chemicals, sand, or steam.

CIAL FIRE FIGHTING PRECAUTIONS

Water/fog is recommended for the control of unconfined oil fires, but water may cause frothing or eruption in closed tank.

FIRE EXTINGUISHING AGENTS TO AVOID

See: Special Fire Fighting Precautions.

SPECIAL PRECAUTIONS/PROCEDURES

Self-contained respirator equipment and full protective clothing should be worn when fumes and/or smoke are present. A complete soap and water shower should be taken at the end of each working day. Scott Air-Pack should be available.

E. PERSONAL PROTECTIVE EQUIPMENT

RESPIRATORY PROTECTION

Use a NIOSH approved respirator with suitable organic vapor cartridge.

EYES AND FACE

Safety glasses, goggles or face shield.

HANDS, ARMS, AND BODY

Long-sleeved clothing closed at the neck and non-porous gloves. For exposed skin, use approved creams (e.g. Pro-Tek, Fend A-2, Safeticote Skin Protector No. 83734).

OTHER CLOTHING AND EQUIPMENT

A complete change of work clothes should be used each day if contaminated.

P. PHYSICAL DATA

MATERIAL IS (AT NORMAL CONDITIONS):	APPEARANCE AND ODOR	
☒ LIQUID ☐ SOLID ☐ GAS ☐ _____	Dark brown liquid with a penetrating smokey odor and a burning caustic taste.	
BOILING POINT 210-425 °C MELTING POINT °C	SPECIFIC GRAVITY (H_2O = 1) 1.03 - 1.18	VAPOR DENSITY (AIR = 1) >1
SOLUBILITY IN WATER (% by weight) Insoluble	pH.	VAPOR PRESSURE (mm Hg at 20° C) 100°C - 80 MM 125°C - 225 MM 150°C - 370 MM
EVAPORATION RATE (Butyl Acetate = 1) <1	% VOLATILES BY VOLUME (At 20°C)	

G. REACTIVITY DATA

STABILITY	CONDITIONS TO AVOID
☐ UNSTABLE ☒ STABLE	None known
INCOMPATIBILITY (MATERIALS TO AVOID) None known	
HAZARDOUS DECOMPOSITION PRODUCTS Material does not decompose.	
HAZARDOUS POLYMERIZATION ☐ MAY OCCUR ☒ WILL NOT OCCUR	CONDITIONS TO AVOID "Open flame and intense heat."

H. HAZARDOUS INGREDIENTS (Mixtures Only)

MATERIAL OR COMPONENT	%	HAZARD DATA (SEE SECT. J)
(See attached sheet)		

I. ENVIRONMENTAL

DEGRADABILITY

ıe to its low vapor pressure and extremely low evaporation rate, the ılatility rate at 20°C is almost zero. Upon heating, at extremely high temperatures, hydrocarbons will be emitted and some degradation will take place.

OCTANOL/WATER PARTITION COEFFICIENT

WASTE DISPOSAL METHODS*

Burial or incineration.

*DISPOSER MUST COMPLY WITH FEDERAL, STATE AND LOCAL DISPOSAL OR DISCHARGE LAWS.

J. REFERENCES

PERMISSIBLE CONCENTRATION REFERENCES

OSHA General Industry 29 CFR 1910. Coal Tar Pitch Volatiles (CTPV)

REGULATORY STANDARDS

SH Criteria Document - Coal Tar Products
. JT CFR 49 Parts 100-199
USEPA 40 CFR 112

GENERAL

National Fire Prevention Association, Fire Protection Hand Book,
NFPA 325 m, NFPA 491 M
Encyclopedia of Occupational Health and Safety, Vol. I, McGraw Hill

K. ADDITIONAL INFORMATION

See attached Technical Data Report (PC-7)
"Using Coal Tar Products With Safety"

Allied
Chemical
An ALLIED Company

TAR PRODUCTS DEPARTMENT
P.O. Box 1053-R
Morristown, N.J. 07960

TAR PRODUCTS
TECHNICAL DATA REPORT

PC.- 7
3 - 1 - 66
Rev. 9 - 81

USING COAL TAR PRODUCTS WITH SAFETY

Frequent, prolonged or occasional but intensive contact of the skin with tars, creosotes, tar distillates, heavy oils, pitches, pitch dusts - also their compositions such as cements, paints, enamels, etc. often cause skin irritation somewhat like sunburn. This skin irritation is accentuated by sunlight. Continued or repeated exposure can cause skin disorders such as dermatitis, tar warts, rough skin. Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growths and may, in some cases, result in skin cancer.

Some individuals are more susceptible than others to skin disorders. Fair-haired, light-complexioned persons are more apt to be affected than dark-haired, dark-skinned people.

Precautionary measures should be given to and followed by workers handling coal-tar products. Personnel can help themselves to avoid or reduce the severity of such skin affections by keeping tars, oils, pitches and such materials off the body and by promptly and thoroughly cleansing in the case of accidental contamination. Adequate ventilation should be maintained and breathing of vapors avoided.

Personal cleanliness is most important in preventing skin irritation. Work garments should be washed with reasonable frequency - not less than once a week. If protective creams are used, apply before starting work and after each periodic washing. When halting work to eat or at the end of work shift, cleanse hands and arms thoroughly with mild soap and warm water using soft brush when needed. Do not use coal tar, petroleum, or other such solvents for removal of tar or oil from the skin. Such solvents defat the skin and may cause dermatitis or aggravate existing skin diseases.

Workmen handling coal tar products should wear clothing closed at the neck, and should wear long sleeves and impermeable gloves. Contaminated gloves, clothing, etc. should be removed immediately and cleaned prior to reuse, or disposed of.

If workmen are exposed to fumes or dusts and ventilation is not adequately suitable, respirators and goggles should be provided. The American Optical Company is a leading manufacturer of such equipment that will give protection under adverse conditions.

Irritation of the skin and sunburn reactions in handling coal tar products can usually be alleviated or prevented by the use of protective creams and sunscreen agents. Protective or "barrier-creams" form a film that acts both as a chemical and physical "barrier" between the skin and the contaminant and tends to resist penetration of the contaminant into the pores of the skin. In applying "barrier" creams, be sure the skin is clean and dry. Sunscreen agents filter out most of the ultra-violet rays from the sun.

A suggested application is to use a high protection sunscreen (sun protection factor 15 or greater) such as Coppertone Super Shade Lotion applied to clean skin and allowed to dry (5 minutes). This sunscreen blocks out most ultra-violet lengths of the sun's rays. Ultra-violet rays are emitted throughout the day and evening, regardless of cloud cover. Next, a protective barrier cream such as Ply-9, which is solvent resistant and water soluable (for easier clean-up) should be applied. This cream will occlude the skin pores and form a "barrier" so that the chemicals cannot penetrate. Creams that are not solvent resistant such as Jergins SBS44, West Chemical's 411, or MSA's FEND should be avoided. Repeat applications each time after washing or after rough work which would remove the protective film by abrasion. To remove, wash skin with warm water and mild soap. One of the advantages of protective creams is that it makes it easier to clean tars, oils, etc. off the skin.

Vi-lan cleaner is a product which has been used with success to remove coal tar products from the skin. The exposed skin is washed with Vi-lan and rinsed well with water.

Barrier products that appear to offer worthwhile protection are:

Coppertone Super Shade Sunblocking Lotion. — Plough, Inc. Memphis, Tenn. 38151

Ply #9 — The Milburn Company 3246 E. Woodbridge Detroit, Michigan 48207

For skin cleaning:

Vi-lan Antiseptic Skin Cleaner — Dameron Enterprises, Inc. 7635 National Turnpike Louisville, Kentucky 40214 (502) 368-1641

FIRST AID MEASURES

INHALATION: Remove to fresh air. If not breathing, give artificial respiration; preferably mouth to mouth. If breathing is difficult, give oxygen. Call a physician.

SKIN CONTACT: Remove with waterless hand cleaners or soap and water. Avoid solvents. For relief from irritation, creams such as Topicort, Cortaid and Lanacort have been useful.

Topicort Emollient Cream — Hoechst - Roussel Pharmaceuticals, Inc. Somerville, New Jersey 08876

EYE CONTACT: Flush eyes immediately with large amounts of water or mineral oil for at least 15 minutes. Call a physician.

INGESTION: First induce vomiting, then take 2 tablespoons of activated charcoal - USP (drug grade) in water. Get immediate medical attention.

CREOSOTE COMPOUNDS

	Formula	Boiling Point	Concentration Range
Coumarone	C_8H_6O	174	A
p-Cymene	$C_{10}H_{14}$	177	A
Indene	C_9H_8	182	A
Phenol	C_6H_6O	181	A
O-Cresol	C_7H_8O	190	A
Benzonitrile	C_7H_5N	191	A
m-Cresol	C_7H_8O	202	A
Naphthalene	$C_{10}H_8$	218	D
Thionaphthene	C_8H_6S	222	A
Quinoline	C_9H_7N	243	A
2-Methylnaphthalene	$C_{11}H_{10}$	241	B
Isoquinoline	C_9H_7N	238	A
1-Methylnaphthalene	$C_{11}H_{10}$	245	A
4-Indanol	$C_9H_{10}O$	245	B
2-Methylquinoline	$C_{10}H_9N$	247	A
Indole	C_8H_7N	252	A
Diphenyl	$C_{12}H_{10}$	255	A
1, 6-Dimethylnaphthalene	$C_{12}H_{12}$	262	A
2, 3-Dimethylnaphthalene	$C_{12}H_{12}$	266	A
Acenaphthene	$C_{12}H_{10}$	281	D
Dibenzofuran	$C_{12}H_{10}O$	287	D
Fluorene	$C_{13}H_{10}$	299	D

	Formula	Boiling Point	Concentration Range
1-Naphthonitrile	$C_{11}H_7N$	297	A
3-Methyldiphenylene	$C_{13}H_{10}O$	298	B
2-Naphthonitrile	$C_{11}H_7N$	304	A
9, 10-Dihydroanthracene	$C_{14}H_{10}$	305	B
2-Methylfluorene	$C_{14}H_{12}$	318	B
Diphenylene Sulfide	$C_{12}H_8S$	332	B
Phenanthrene	$C_{14}H_{10}$	340	D
Anthracene	$C_{14}H_{10}$	342	C
Acridene	$C_{13}H_9N$	346	A
3-Methylphenanthrene	$C_{13}H_{12}$	350	B
Carbazole	$C_{12}H_9N$	352	B
4, 5-Methylenephenanthrene	$C_{15}H_{10}$	353	B
2-Methylanthracene	$C_{15}H_{12}$	360	A
9-Methylanthracene	$C_{15}H_{12}$	361	B
2-Methylcarbazole	$C_{13}H_{11}N$	363	B
Fluoranthene	$C_{16}H_{10}$	382	D
1, 2-Benzodiphenylene	$C_{16}H_{10}O$	395	B
Pyrene	$C_{16}H_{10}$	393	B
Benzofluorene	$C_{17}H_{12}$	413	B
Chrysene	$C_{18}H_{12}$	448	B
Unidentified Compounds in Distillate			D

A = Compounds having a concentration less than 0.5%
= Compounds having a concentration greater than 0.5% and less than 3.0%
C = Compounds having a concentration greater than 3.0% and less than 5.0%
D = Compounds having a concentration greater than 5.0%

M A T E R I A L S A F E T Y D A T A S H E E T PAGE: 1

DOW CHEMICAL U.S.A. MIDLAND MICHIGAN 48640 EMERGENCY PHONE: 517-636-4400

EFFECTIVE DATE: 13 SEP 79

PRODUCT CODE: 58851

PRODUCT NAME: PENTACHLOROPHENOL DP-2

MSD: 1031

INGREDIENTS (TYPICAL VALUES-NOT SPECIFICATIONS),

ACTIVE INGREDIENTS:	%
PENTACHLOROPHENOL	
OTHER CHLOROPHENOLS	85
INERT INGREDIENTS	10
	5

EPA REGISTRATION # 464-388

SECTION 1 PHYSICAL DATA

BOILING POINT: 527F, 275C
VAP PRESS: 400 MMHG @ 284C
VAP DENSITY (AIR=1): NOT APPL.
APPEARANCE AND ODOR: LIGHT TAN SOLID - PHENOLIC ODOR.
SOL. IN WATER: .01G/100G @ 20C
SP. GRAVITY: 1.97 (SOLID)
% VOLATILE BY VOL: NOT APPL.

SECTION 2 FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: ----
METHOD USED: ----
FLAMMABLE LIMITS (STP IN AIR)
LFL: ---- UFL: ----
EXTINGUISHING MEDIA: LARGE FIRES; WATER FOG, FOAM. SMALL FIRES; CARBON DIOXIDE, OR DRY CHEMICAL.
SPECIAL FIRE FIGHTING EQUIPMENT AND HAZARDS: GAS MASK (ORGANIC OR ACID CANISTER). IF WATER IS USED, PREVENT RUN-OFF FROM ENTERING SEWERS OR WATERWAYS. HYDROGEN CHLORIDE GAS IS EVOLVED DURING BURNING.

SECTION 3 REACTIVITY DATA

STABILITY: WILL NOT IGNITE IN AIR WHEN TESTED TO 550C.
INCOMPATIBILITY: VERY STRONG OXIDIZERS.
HAZARDOUS DECOMPOSITION PRODUCTS: HYDROGEN CHLORIDE.
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR.

SECTION 4 SPILL, LEAK, AND DISPOSAL PROCEDURES

ACTION TO TAKE FOR SPILLS (USE APPROPRIATE SAFETY EQUIPMENT): CLEAN UP ALL TRACES. SHOVEL UP AS MUCH AS POSSIBLE INTO CLEAN, DRY CONTAINERS. ON HARD SURFACES USE ABSORBENT MATERIAL TO PICK UP REMAINDER; ON LOOSE

(CONTINUED ON PAGE 2)

6 38617

EFFECTIVE DATE: 13 SEP 79
PRODUCT (CONT'D): PENTACHLOROPHENOL DP-2 PRODUCT CODE: 58851
MSD: 1031

SECTION 4 SPILL, LEAK, AND DISPOSAL PROCEDURES (CONTINUED)

ACTION TO TAKE FOR SPILLS (USE APPROPRIATE SAFETY EQUIPMENT): (CONTINUED)
SURFACES SHOVEL UP CONTAMINATED LAYER. AVOID USE OF WATER; PRODUCT IS HIGHLY TOXIC TO AQUATIC LIFE.
DISPOSAL METHOD: LOCAL REGULATIONS MAY PERMIT BURNING. OTHERWISE, KEEP MATERIAL IN CLOSED CONTAINERS AND CALL SUPPLIER FOR ADVICE.

SECTION 5 HEALTH HAZARD DATA

INGESTION: MODERATE SINGLE DOSE ORAL TOXICITY; LD50 (RAT FEMALE) 135; (MALE) 205 MG/KG.
EYE CONTACT: UP TO SLIGHT IRRITATION, POSSIBLE MILD TRANSIENT CORNEAL INJURY.
SKIN CONTACT: UP TO SLIGHT TO MODERATE IRRITATION, EVEN A SLIGHT BURN UPON PROLONGED, REPEATED CONTACT.
SKIN ABSORPTION: POWDER NOT LIKELY TO BE ABSORBED IN TOXIC AMOUNTS; STRONG SOLUTIONS READILY ABSORBED IN TOXIC AMOUNTS.
INHALATION: OSHA GUIDE AND ACGIH TLV 0.5 MG/M3. NOT LIKELY A PROBLEM BECAUSE OF GOOD WARNING PROPERTIES.
EFFECTS OF OVEREXPOSURE: DUSTS IRRITATING TO NOSE AND THROAT. BY INGESTION, MAY CAUSE ELEVATION OF BODY TEMPERATURE.

SECTION 6 FIRST AID--NOTE TO PHYSICIAN

FIRST AID PROCEDURES:

EYES: PROMPTLY FLUSH WITH WATER FOR AT LEAST 15 MINUTES. GET MEDICAL ATTENTION PROMPTLY.
SKIN: IN CASE OF CONTACT, IMMEDIATELY FLUSH SKIN WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES WHILE REMOVING CONTAMINATED CLOTHING AND SHOES. CALL A PHYSICIAN. WASH CONTAMINATED CLOTHING BEFORE REUSE. DESTROY CONTAMINATED SHOES.
INHALATION: REMOVE TO FRESH AIR IF EFFECTS OCCUR. CALL A PHYSICIAN AND/OR TRANSPORT TO MEDICAL FACILITY.
INGESTION: IF SWALLOWED, INDUCE VOMITING IMMEDIATELY BY GIVING TWO GLASSES OF WATER AND STICKING FINGER DOWN THROAT. CALL A PHYSICIAN. NEVER GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

NOTE TO PHYSICIAN:

EYES: MAY CAUSE MODERATE IRRITATION. STAIN FOR EVIDENCE OF CORNEAL INJURY. IF CORNEA IS BURNED, INSTILL ANTIBIOTIC STEROID PREPARATION FREQUENTLY. CONSULT OPHTHALMOLOGIST.
SKIN: MAY CAUSE MODERATE IRRITATION. MAY CAUSE SLIGHT BURN WITH PROLONGED CONTACT. IF RASH IS PRESENT, TREAT AS ANY CONTACT DERMATITIS. IF BURN IS PRESENT, TREAT AS ANY THERMAL BURN.

(CONTINUED ON PAGE 3)

7 38618

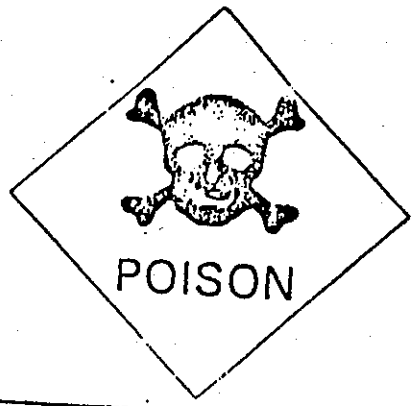
CHEMICAL SPECIALTIES, INC.

OLD CLYATTVILLE ROAD • PHONE (912) 242-4813 • P.O. BOX 1745
VALDOSTA, GEORGIA 31601

SAFETY INFORMATION

TOXICITY: Greenwood Concentrate is classed as a Class B Poison - E.P.A. Category 1.

The following excerpts from the registered label should be read and the safety instructions followed:



KEEP OUT OF REACH OF CHILDREN

DANGER POISON

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call physician at once. Dilute stomach contents by giving patient 2-4 glasses of milk or water. Induce vomiting by finger in throat. Repeat until vomit is clear. Give 4 oz. of milk of magnesia followed by whites of 2 eggs beaten in a glass of water, or glass of milk. Keep patient calm and warm to avoid shock. (Never give anything by mouth to an unconscious person.)

IF IN EYES OR ON SKIN: Causes irreversible eye damage. Flush eyes or skin for 15 minutes with plenty of water, preferably warm. For eyes, be sure to wash under eyelids; call physician. After flushing, wash skin with soap thoroughly. Remove contaminated clothing at once. (Wash before reusing, discard contaminated shoes.) For severe or persistent skin irritation, consult physician promptly.

SEE LEFT PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

- Corrosive. Causes irreversible eye damage, skin or mucous membrane irritation.
- Harmful or fatal if swallowed. Do not swallow liquid or inhale dust.
- Handle in well ventilated area. Open drum with care to vent any pressure.
- Do not get in eyes, on skin, or on clothing.
- Wear goggles or face shield and rubber gloves. Wash thoroughly with soap and water after handling.

Environmental Hazards

This product is toxic to fish and wildlife. Do not apply directly to water. Do not contaminate water by cleaning equipment or disposal of wastes.

DIRECTIONS FOR USE

(It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.)

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

SPILLS: Cover liquid with enough lime to neutralize acid and form alkaline paste. Shovel into steel or polyethylene container for disposal. Do not flush into sewer or stream.

PESTICIDE DISPOSAL: Pesticide, spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to Federal, State or Local procedures under the Resource Conservation and Recovery Act.

METAL DRUM DISPOSAL: The empty container must be triple rinsed (or equivalent) and offered for recycling or reconditioning, or disposed of in a sanitary landfil, or by other approved State and local procedures

CCA · Concentrate Wood Preservative

Arsenical mixture—Class B poison

HAZARDS

FIRE Strong oxidizing agent. Concentrate will not burn. May cause fire on contact with combustibles.

EXPOSURE May be fatal if swallowed, absorbed through the skin, or the mist (aerosol) breathed in. Causes severe burns to the skin and eyes.

In case of accident

IF THIS HAPPENS	DO THIS
Spill or Leak	Limit the spread of spill and keep people away. Dike spill area with lime, cement, sand or soil. Sawdust or wood chips may be used for liquid absorption. IMPORTANT! All contaminated sawdust must be recovered and neutralized. Clean-up efforts should not begin until material is treated with lime or cement for absorption and neutralization (see chart on back side). If feasible and without risk, repair the leaking tank to limit spill. Handle neutralized material with care. It is poisonous by skin contact or ingestion. Collect in stainless or carbon steel drums or equipment. Sweep up or vacuum area thoroughly to remove all material. Run-off to sewers or streams may create toxic hazard; notify health and pollution control authorities.

FIRST AID INSTRUCTIONS

Call a Physician.

In case of contact, immediately remove all contaminated clothing and shoes while flushing the skin or eyes with plenty of water for at least 15 minutes; get medical attention. Wash clothing before reuse and discard contaminated shoes.

If swallowed and if conscious, make patient vomit immediately (finger down throat) and call A PHYSICIAN. Give patient lime water and make vomit, repeat until doctor arrives. If lime water is not available, use a tablespoon of salt in a glass of warm water and repeat until fluid is clear.

In case of accident

IF THIS HAPPENS	DO THIS
Fire	Cannot burn, although if it comes in contact with certain organic materials, a fire may result. On small fires use dry chemicals or carbon dioxide. On large fires use water fog (preferably) or water spray. Notify authorities that run-off may create toxic hazard.
Exposure	Do not get in eyes, on skin, on clothing. Wear face shield, complete impervious protective clothing, rubber gloves and rubber boots when handling. If mist or aerosol is present, wear National Institute of Safety and Health (NIOSH) approved respiratory protection. In case of contact, immediately remove all contaminated clothing, including shoes, and flush skin with plenty of water for at least 15 minutes. Flush eyes for 15 minutes and get immediate medical attention in all cases. Wash clothes before reuse. WASH THOROUGHLY AFTER HANDLING.

Methods of Handling Accidental Spills of CCA- Concentrate 50% Liquid Concentrate

Volume of CCA-Concentrate Spilled	Quality of Neutralizing Agent Required	
	Lime	Cement
50 gallons	200 pounds	800 pounds
500 gallons	1 ton	4 tons
1,000 gallons	2 tons	8 tons
3,000 gallons	6 tons	24 tons
5,000 gallons	10 tons	40 tons

While prepared from sources and data believed reliable, Koppers makes no warranty that the information is, in all cases, correct or sufficient.

Koppers Company, Inc., Pittsburgh, Pa. 15219

KOPPERS
Chemicals and Coatings

MATERIAL SAFETY DATA SHEET

(Approved by U.S. Department of Labor "Essentially Similar" to Form LSB-00S-4)

WHILE THE INFORMATION AND RECOMMENDATIONS SET FORTH HEREIN ARE BELIEVED TO BE ACCURATE AS OF THE DATE HEREOF, KOPPERS COMPANY MAKES NO WARRANTY WITH RESPECT THERETO AND DISCLAIMS ALL LIABILITY FROM RELIANCE THEREON.

Specialty Wood Chem

DATE OF PREP.
March 31, 1975

Section I — PRODUCT IDENTIFICATION

MANUFACTURER'S NAME
KOPPERS COMPANY, INC.

EMERGENCY TELEPHONE NO.
412/391-3300 X-2252 780 o

STREET ADDRESS
Koppers Building

CITY, STATE, AND ZIP CODE
Pittsburgh, Pennsylvania 15219

MANUFACTURER'S CODE IDENTIFICATION
FPL 0399 RO1 203M2 EPA Reg. No. 61-128

PRODUCT CLASS

TRADE NAME
CCA-CONCENTRATE 50%

Section II — HAZARDOUS INGREDIENTS

INGREDIENT	PERCENT	TLV PPM	TLV mg/M³	REMARKS
Chromic Acid (CrO_3)	23.75		0.5	as Chromium
Cupric Oxide (CuO)	9.25		1.0	as Copper
Arsenic Pentoxide (As_2O_5)	17.00		0.5*	1.1% water soluble arsenic

*as As (change pending)

Section III — PHYSICAL DATA

BOILING RANGE
N. A.

PERCENT VOLATILE BY VOLUME
N. A.

SPECIFIC GRAVITY (H₂O = 1)
N. A.

VAPOR DENSITY
N. A.

APPEARANCE AND ODOR
heavy liquid; dark brown color

FREEZING POINT
N. A.

VAPOR PRESSURE AT 20° C
N. A.

EVAPORATION RATE (BUTYL ACETATE = 1)
N. A.

SOLUBLE IN WATER - % WT.
100

Section IV — FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (METHOD USED)
None - water solution

EXTINGUISHING MEDIA
N. A.

FLAMMABLE LIMITS
N. A.

LEL | UEL

UNUSUAL FIRE AND EXPLOSION HAZARDS
Concentrate will not burn but chromic acid content makes this product a strong oxidizing agent. May cause fire if contact with organic combustible materials. Upon intimate contact with powerful reducing agents, it may cause violent explosions.

SPECIAL FIRE FIGHTING PROCEDURES
Self-contained breathing apparatus - NIOSH approved.

MATERIAL SAFETY DATA SHEET

Section V — HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE
Mixture - See Individual TLV's in Section II

LD50 oral (rats) 90 mg/kg
LD50 skin (rabbits) 40 mg/kg

EFFECTS OF OVEREXPOSURE
Mist (not vapors) or spray causes severe irritation of the nose and throat. Depending on
tact time, corrosive to the skin and irritating to the eyes. May cause ulceration and
erforation of nasal septum upon prolonged exposure to mist.

EMERGENCY AND FIRST AID PROCEDURES
swallowed and if conscious, make patient vomit immediately by sticking finger down throat.
Call a physician. Give patient lime water and make vomit; repeat until physician arrives. If
ime water is not available, use salty water. Inhalation - remove to fresh air.
kin and Eyes - flush with plenty of water for at least 15 minutes.

Section VI — REACTIVITY DATA

STABILITY (Check One)		
	☐ UNSTABLE	CONDITIONS TO AVOID: Powerful reducing agents (react with chromic acid and may reduce
	☒ STABLE	arsenic acid to arsine gas).

INCOMPATABILITY (Materials to avoid)
lascent hydrogen, alkaline materials, reducing agents

HAZARDOUS DECOMPOSITION PRODUCTS
rsenical compounds

HAZARDOUS POLYMERIZATION (Check One)		
	☐ MAY OCCUR	CONDITIONS TO AVOID: Avoid contact with organic materials which may be easily
	☒ WILL NOT OCCUR	oxidized.

Section VII — SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
not breathe mist or spray. Do not contact skin, eyes, clothing, or shoes. Use protective
asures outlined in Section VIII below. Use sand, soil, sawdust, etc. to dam (contain)
l. Preferably use a liquid recovery type vacuum cleaner to recover. Use an inert
rbent to complete clean-up. IMPORTANT! All contaminated sawdust must be neutralized
lime or cement before clean-up efforts begin. Use ratio of 200 lbs. lime or 800 lbs.
ment per 50 gallons 50% Concentrate.

WASTE DISPOSAL METHOD
referably recycle to treating process. Disposal must be carried out in accordance with
cal, state and federal regulations. Handle waste with care. It is poisonous by skin
ntact or ingestion.

Section VIII — SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (specify type) *Only in the presence of a spray or mist of the solution. NIOSH
USBM) approved TC-21C respirators for mists having a TWA of not less than 0.05 mg/M³

VENTILATION	LOCAL EXHAUST	SPECIAL
	N.A.	N.A.
	MECHANICAL (General)	OTHER
	N.A.	*requirement change pending due to OSHA regulations under development at press time.

PROTECTIVE GLOVES
bber

EYE PROTECTION
Chemical goggles

OTHER PROTECTIVE EQUIPMENT
veralls and rubber apron, Rubber shoes or boots.

Section IX — SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING
re in a closed, properly labeled container.
ep out of reach of children.

OTHER PRECAUTIONS
prolonged and/or repeated inhalation of mist or spray, or contact with the skin or
. Do not take internally. Use respiratory devices only where oxygen level is at least
, otherwise use self-contained units. If spilled to a stream or sewer, notify health
pollution control authorities.

ATTACHMENT J

INSPECTION SCHEDULES

GROUNDWATER MONITOR WELL SAMPLING LOG

FACILITY: Colfax Creosoting Co. SAMPLING PERIOD: _____ SAMPLING DATE: _____

LOCATION: Pineville, LA PARAMETERS: _____ SAMPLER'S NAME: _____

WELL NUMBER	SAMPLE NUMBER	TOTAL DEPTH*	DEPTH TO WATER*	ONE WELL VOLUME	PURGING METHOD	GALLONS PURGED**	SAMPLING METHOD	TIME SAMPLED

*MEASURED FROM THE TOP OF THE PVC CASING **MEASURED TO THE NEAREST 0.5 GALLON

WEATHER CONDITIONS: _____

METHOD OF SHIPMENT TO LAB: _____

FIELD OBSERVATIONS: _____

Ball Engineering, Inc.

CHAIN OF CUSTODY

FACILITY: Colfax Creosoting Co.

LOCATION: Pineville, LA

SAMPLER'S SIGNATURE: _____

SAMPLE NUMBER	WELL NUMBER	DATE SAMPLED	TIME SAMPLED	NUMBER OF CONTAINERS	CONTAINER DESCRIPTION	PARAMETERS

RELINQUISHED BY:	DATE/TIME	RECEIVED BY:	DATE/TIME	REMARKS:
RELINQUISHED BY:	DATE/TIME	RECEIVED BY:	DATE/TIME	REMARKS:
RELINQUISHED BY:	DATE/TIME	RECEIVED BY:	DATE/TIME	REMARKS:

Ball Engineering, Inc.

POST CLOSURE QUARTERLY CHECKLIST

DATE OF INSPECTION: _____
NAME OF INSPECTOR: _____
UNIT INSPECTED: _____

ITEM	DESCRIPTION	DEFICIENCY	DATE AND NATURE OF REPAIRS
MAINTENANCE ITEMS			
1.	Evidence of Erosion and Erosion Damage	_____	_____
2.	Cover Integrity, Settlement, Subsidence and Displacement	_____	_____
3.	Vegetative Cover Condition	_____	_____
4.	Grass Growth	_____	_____
5.	Ponding on Cover	_____	_____
6.	Integrity of Run-on and Run-off Structures	_____	_____
7.	Functioning of Cover Drainage System	_____	_____
MONITOR WELL ITEMS			
1.	Surface Leakage to Wells	_____	_____
2.	Condition of wells	_____	_____
3.	Integrity of Locks	_____	_____
SECURITY ITEMS			
1.	Security Control Devices	_____	_____
2.	Evidence of Vandalism	_____	_____
3.	Integrity of Benchmarks	_____	_____

INSPECTOR'S SIGNATURE: _____

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
GROUND WATER PROTECTION DIVISION

GROUND WATER MONITORING DATA REPORT FORM

Covering the period from: to:

ompany Name: EPA Id. No.:

ailing Address: Phone No.:

ontact: Title: Phone No.

aboratory: Address:

nalytical Methods:

Metals:

Pesticides:

Volitile Organics:

Base/Neutral Extractable:

Acid Extractable:

Other:

ertification.

I certify under penalty of law that I have personally examined and am familiar with the nformation submitted in this and all attached documents, and that based on my inquiry of those ndividuals immediately responsible for obtaining the information, I believe that the submitted nformation is true, accurate and complete. I am aware that there are significant penalties for ubmitting false information, including the possibility of fine or imprisonment.

ignature:_____ Title: Date:

WELL INFORMATION

Parameters \ Well number								
Latitude								
Longitude								
Type								
Unit monitored								
Up or down gradient								
Monitored zone thickness								
Construction								
Sampling method								
Casing elevation								
Well depth								
Screen interval, From To								
Elevation of water (MSL)								
Gallons purged								
Date sampled								

MONITORING WELL DATA

Parameters \ Well number (mg/l)								
Site Specific or Other								

COLFAX CREOSOTING COMPANY
RECOVERY LOG

Month of _____, 19__

RECOVERY WELLS P-1 AND P-2
Weekly Inspection, Monitoring, and Monthly Sampling

RECOVERY			INSPECTION					
Date	Well Discharge, GPH		Note: If item is in good condition, mark box "OK" and initial					
	P-1	P-2	Well	Pump	Lines/ Hoses	Controller	Air Compressor	Tanks
Date of Monthly Sample			Comments:					
Person Sampling								
Date Shipped								

Figure 9

WEEKLY INSPECTION LOG OF COLFAX CREOSOTING COMPANY

ITEM	TYPES OF PROBLEMS	DATE
INITIALS OF INSPECTOR		
OPERATING & STRUCTURAL EQUIPMENT		
PIPELINES AND VALVES	LEAKS, CORROSION OR DETERIORATION	
PUMPS/SUMPS	POWER, LEAKING, CLOGGING	
TANKS	CRACKING, LEAKING, CORROSION, BUCKLES, BULGES	
CONCRETE TANK FOUNDATION	EROSION, CRACKS, UNEVEN SETTLING, WET SPOTS	
CYLINDERS	CORROSION, LEAKS, BUCKLES, BULGES	
STORAGE AREAS	LEAKS, SPILLS	
TANK STORAGE AREA		
BASE OR FOUNDATION	CRACKS, SPILLS, SPALLS, EROSION,UNEVEN SETTLING	
DIKE	CRACKS, DETERIORATION	
PIPES, VALVES FITTINGS	LEAKS, CORROSION,DETERIORATION	
EXTERNAL TANK		
FOUNDATION/STRUCTURAL SUPPORTS		
PIPE CONNECTIONS	EXTERNAL CORROSION, CRACKS, DISTORATION, DETERIORATION	
PROTECTIVE COATING	ROUGH SPOTS, BLISTERING, FILM LIFTING	
TANK SHELL	CORROSION, DISCOLORATION, CRACKS, BUCKLES, BULGES	
NOZZLES	CRACKS, CORROSION	

*NOTE: MAKE ANY OBSERVATIONS ON THE BACK OF THIS SHEET ALONG WITH DATE AND NATURE OF REPAIRS AND/OR REMEDIAL ACTION

PERIODIC INSPECTION LOG OF UNLOADING

DATE INSPECTED	PRESERVATIVE UNLOADING AREA AFTER DELIVERY	LIQUID LEVEL IN TANKS	INITIALS

DAILY INSPECTION LOG FOR COLFAX CREOSOTING COMPANY

MONTH _____

ITEM	DATE	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
INITIALS OF INSPECTOR																																
DISCHARGE CONTROL SYSTEMS, VALVES AND PIPING TO AND FROM TANKS	LEAKS, LEAKING VALVES, CORROSION (REFER TO FIG. II-1 IN THE CONTINGENCY PLAN)																															
TANK A #3 W.T.																																
B #4 W.T.																																
C CCA CONC.																																
D CCA W.T.																																
E CCA W.T.																																
F CCA WASTE WATER																																
G DIESEL STORAGE																																
H #2 W.T.																																
I #1 W.T.																																
J PENTA SEP.																																
K #3 CREO. SEP.																																
L #2 CREO. SEP.																																
M #1 CREO. SEP.																																
N SEW. CAR																																
O #4 S.T.																																
P #3 S.T.																																
Q #2 S.T.																																
R #1 S.T.																																
S B.M.																																
T R.M.																																
U #7 W.T.																																
V #7 W.T.																																
W DIESEL TANK																																
CYLINDER #1																																
#2																																
#3																																
#4																																

*NOTE: MAKE ANY OBSERVATIONS ON THE BACK OF THIS SHEET ALONG WITH THE DATE AND NATURE OF REPAIRS AND/OR REMEDIAL ACTION

PERIODIC INSPECTION LOG FOR COLFAX CREOSOTING COMPANY

ITEM	TYPES OF PROBLEMS	FREQUENCY	DATE			
INITIALS OF INSPECTOR						
SAFETY AND EMERGENCY EQUIPMENT						
FIRE EXTINGUISHERS	NEED RECHARGING	MONTHLY/AS USED				
1 - TREATING ROOM OFFICE						
4 - 1 AT EACH TREATING ROOM ENTRANCE						
1 - NORTH OFFICE IN TREATING ROOM						
FOAM SYSTEM	GUNS CLOGGED, OUT OF FOAM	MONTHLY/AS USED				
EMERGENCY SHOWER	WATER PRESSURE, LEAKS, DRAINAGE	MONTHLY/AS USED				
FIRE HOSES	LEAKS, LOW WATER PRESSURE	MONTHLY/AS USED				
1 - BY VACUUM PUMP						
1 - BY #4 STORAGE						
1 - BY WOLMAN TANK						
1 - ACROSS ROAD FROM BACK OF #4 CYL.						
FIRST AID KIT, EQUIPMENT & SUPPLIES	ITEMS OUT OF STOCK, INOPERATIVE	AS USED				
1 - TREATING OFFICE						
1 - LAB TRAILER						
RESPIRATORS-IN TREATING OFFICE	SEALS, LEAKS,	MONTHLY				
TELEPHONE SYSTEM	POWER	PER NFPA				
PROTECTIVE CLOTHING (GLOVES, BOOTS)	HOLES, NORMAL WEAR AND TEAR	AS USED				
TRUCK UNLOADING AREA	LEAKS, SPILLS	AFTER UNLOADING PRESERVATIVE	SEE ATTACHED SHEET			
INTERNAL TANK						
TANK ROOF	MALFUNCTION OF ROOF SEALS, CORROSION	WHEN TANK IS DOWN				
INTERNAL SUPPORTS	DETERIORATION, DEPRESSIONS	WHEN TANK IS DOWN				
TANK SHELL	CORROSION OF VAPOR SPACE AND LIQUID LEVEL LINE, CRACKING, BULGES, HOLES, SEAMS	WHEN TANK IS DOWN				
TANK BOTTOM	CORROSION PITS, SPRUNG SEAMS, RIVITS, DEPRESSIONS, UNEVENNESS OF BOTTOM	WHEN TANK IS DOWN				
TANK DATA						
LIQUID LEVEL IN TANKS	OVERFLOW OF PRESERVATIVE	PRIOR TO ADDING MATERIAL	SEE ATTACHED SHEET			

*NOTE: MAKE ANY OBSERVATIONS ON THE BACK OF THIS SHEET ALONG WITH THE DATE AND NATURE OF REPAIRS AND/OR REMEDIAL ACTION

REPORTING FORM FOR EMERGENCY EVENTS

Name, address, and phone number of owner or operator

Name, address, and phone number of facility

Date, time, and type of incident (e.g., fire, explosion, etc.)

Name and quantity of material(s) involved

Extent of injuries (if any)

Assessment of actual or potential hazards to human health or the environment (if applicable)

Estimated quantity and disposition of material recovered from the incident

Send to: (Name)

Charles Gazda, Branch Chief (6ES-E)
U.S. EPA Region VI
Interfirst 2 Building
1201 Elm Street
Dallas, TX 75270

Glen A. Miller, Administrator
Louisiana Department of Environmental Quality
Hazardous Waste Division
P.O. Box 44066
Baton Rouge, LA 70804

FIGURE II-5. SAMPLE REPORTING FORM FOR EMERGENCY EVENTS.

PERSONNEL TRAINING PROGRAM FOR HAZARDOUS WASTE TREATMENT FACILITIES

Employee Name: _____
Last First Middle

Date First Employed In Position: _____

Date Last Employed In Position: _____

Position: _____

Description of Training	Amount of Training	Date	Directed By

ATTACHMENT K

FINAL REVISION ATTACHMENTS
PER DEQ LETTER OF
FEBRUARY 14, 1990

ATTACHMENT K

FINAL REVISION ATTACHMENTS

The following itemized information is in response to the DEQ letter of February 14, 1990 listing deficiencies in Attachments A-D and F-K of the revised PCPA dated April 28, 1989.

Attachment A
Post-Closure Plan The facility center point is approximately located at the treating plant. The longitude and latitude at this point is as follows:

Longitude 92° 25' 33"
Latitude 31° 19' 04"

Attachment B
Post-Closure Estimate Please see the following three pages that revise the existing post-closure cost estimate to include additional one-time costs for decontamination, well abandonment, certification, notice to land authority and the deed notation. In addition, item 4 of the annual costs was revised to reflect the current monitoring plan. Also attached are pages 17 and 21 of the PCPA listing the revised cost estimate.

Attachment C
Post-Closure Financial Assurance Financial assurance will continue to be provided by a letter of credit. The company is obtaining the revised letter of credit at this time and will send the document at a later date.

Attachment D
Groundwater Monitoring Plan Included with this Attachment are 38 sheets of the registered water wells in Rapids Parish. Those wells within 2 miles of the center of the Colfax facility have a check in the right margin. Information as available from public records includes:

a. Well owner

b. Well usage

c. Pumping rate

d. Well identification number in relation to Figure 8 page 35 of PCPA

e. Aquifer name

f. Well completion date

Figure 9 on page 39 in the application showing the extent of contamination has been revised. The information shown is based on 1989 sampling results. The revised page 39 follows the 38 sheets listing the water wells.

Enclosed is a copy of the revised groundwater monitoring plan to reflect the changes and proposes since February 20, 1989. In addition to the changes in wells, the notification, if contamination is found, will include the concentration of each constituent.

The company has proposed in a letter dated February 19, 1990 to install lower aquifer wells. As soon as the single well is installed and tested, additional deep wells will be installed. If the deep wells indicate contamination additional wells will be installed into a deeper clean water bearing zone.

ATTACHMENT F
Corrective Action Plan The corrective action plan has been revised to include changes since the previously dated plan of October 7, 1988.

ATTACHMENT G
Monitoring Well Locations A map showing the location of the monitoring wells is attached for this section.

ATTACHMENT H
Contingency Plan The contingency plan is currently in Attachment I. We have renamed this section Attachment H as requested and have renamed old Attachment H. We have also revised the table of contents and cover sheet.

ATTACHMENT I
Personnel Training The personnel training plan is currently in Attachment J. We have renamed this section Attachment I as requested. We have also revised the table of contents and cover sheet.

ATTACHMENT J

Inspection Schedule All inspection schedules and forms relating to post closure are now in this section.

ATTACHMENT K

Final Revision Attachments All completed operating records will be included in this section, including groundwater analyses, written records of inspections, training records as required by LAC 33:V.1515., and a copy of annual reports as required by LAC 33:V.1529.D.